

# EXHIBIT 61

Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,                    )  
  Plaintiffs,                                    )  
  vs.   ) No. 20-cv-00983-TSZ  
CITY OF SEATTLE,   )  
  Defendant.   )

ZOOM VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION  
OF  
MICHAEL MALONE

ATTENDANCE OF ALL PARTICIPANTS VIA  
ZOOM VIDEO CONFERENCE

9:00 a.m.  
August 22, 2022

REPORTED BY: Lauren G. Harty, RPR, CCR #2674

1 And then you use an acronym RIVCO? I don't  
2 know what that is. What is RIVCO?

3 A. Our -- it's our core values; relationships,  
4 integrity, vision, community, and ownership.

5 Q. And those are the -- those are Hunters  
6 Capital's core values?

7 A. Yes.

8 Q. Okay.

9 So it -- like its mission statement?

10 MR. REILLY-BATES: Object to the form.

11 A. They're -- they're our core values.

12 Q. (By Mr. Cramer) Okay.

13 Can you say -- can you say them again for  
14 me?

15 A. Relationships, integrity, vision, community,  
16 ownership.

17 Q. And you say, "RIVCO explicitly implies  
18 that...we need to enforce our laws." And you say,  
19 "It's our street, sidewalk and park, all of ours, not  
20 BLM or anyone else's."

21 The street is not Hunters Capital's street,  
22 correct?

23 MR. REILLY-BATES: Object to the form.

24 A. What is it? Street what?

25 Q. (By Mr. Cramer) That it -- you say that it's

## 1 C E R T I F I C A T E

2 STATE OF WASHINGTON )  
 ) ss.  
 3 COUNTY OF KING )

4 I, the undersigned Washington Certified Court  
 5 Reporter, hereby certify that the foregoing deposition  
 6 upon oral examination of MICHAEL MALONE was taken  
 7 before me on August 22, 2022, and transcribed under my  
 8 direction;

9 That the witness was duly sworn by me pursuant  
 10 to RCW 5.28.010 to testify truthfully; that the  
 11 transcript of the deposition is a full, true, and  
 12 correct transcript to the best of my ability; that I  
 13 am neither attorney for nor a relative or employee of  
 14 any of the parties to the action or any attorney or  
 15 counsel employed by the parties hereto, nor am I  
 16 financially interested in its outcome;

17 I further certify that in accordance with  
 18 CR 30(e), the witness was given the opportunity to  
 19 examine, read, and sign the deposition within 30 days  
 20 upon its completion and submission, unless waiver of  
 21 signature was indicated in the record.

22 IN WITNESS WHEREOF, I have hereunto set my hand  
 23 this 29th day of August, 2022

24  
 25

*Lauren G. Harty*  
 LAUREN G. HARTY, CCR #2674

